

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

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2007 DEC 18 A 10:04

DEBRA P. HACKETT, CLM
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

SIMPSON VENTURES, INC.,)

Plaintiff,)

v.)

MID-WEST METAL PRODUCTS)
COMPANY, INC.)

Defendant.)

Case No: 3:07-cv-00048-WHA CSC

Demand for Jury Trial

MID-WEST METAL PRODUCTS)
COMPANY, INC.,)

Counterclaimant,)

v.)

SIMPSON VENTURES, INC.,)

Counterdefendant.)

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Comes now the Plaintiff, Simpson Ventures, Inc., by and through its undersigned counsel who is a member in good standing of this Court, and moves the Court to allow Bradley Kenneth Groff of the law firm Gardner, Groff, Greenwald & Villanueva, P.C. to appear of record in the above-entitled cause and participate *pro hac vice* in this civil action pursuant to Local Rule 83.1(b). As grounds for this motion, Simpson Ventures, Inc. shows the Court as follows:

1. Bradley Kenneth Groff is an attorney licensed to practice law in the State of Georgia, having been admitted in 1994. He is a member in good standing of the bar of

Georgia. He is registered to practice before the United States Patent and Trademark Office. He is also admitted to practice in the United States District Court for the Northern District of Georgia as evidenced by the Certificate of Good Standing which is attached hereto and made a part hereof as Exhibit A. Concurrent with the filing of this motion, Mr. Groff has paid the \$20.00 fee for his admission *pro hac vice*.

2. Mr. Groff is familiar with the law, facts and procedures related to the subject matter of this litigation and his law firm has represented Simpson Ventures, Inc. for several years.

WHEREFORE, THE PREMISES CONSIDERED, Simpson Ventures, Inc. moves this Court to enter an order permitting Bradley Kenneth Groff of the law firm of Gardner, Groff, Greenwald & Villanueva, P.C. to appear of record and participate *pro hac vice* before the United States District Court, Middle District of Alabama, for the purpose of representing Simpson Ventures, Inc. in this case.

Respectfully submitted,



Robert T. Meadows, III (MEA012)
Attorney for the Plaintiff Simpson Ventures, Inc.

OF COUNSEL:

CAPELL & HOWARD, P.C.
3120 B. Frederick Road (36801)
P.O. Drawer 2268
Opelika, Alabama 36803-2268
334.501.1540 (ph)
334.501.4512 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of December, 2007, I have served the above and foregoing Motion on the Defendant by serving them at the following address:

James M. Hinshaw
Bingham McHale LLP
2700 Market Tower
10 W. Market Street
Indianapolis, IN 46204-4900
(317) 635-8900
Pro Hac Vice

Brett A. Ross
Carr Allison
100 Vestavia Parkway
Birmingham, Alabama 35216
(205) 822-2006

(And via Email to James M. Hinshaw at jhinshaw@bringhammchale.com)

Attorneys for Defendant Mid-West Metal Products Company, Inc.



OF COUNSEL

**CERTIFICATE OF GOOD STANDING****UNITED STATES OF AMERICA**

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} ss.

NORTHERN DISTRICT OF GEORGIA

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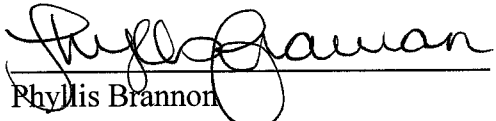
I, James N. Hatten, Clerk of the United States District Court for the Northern District of Georgia,

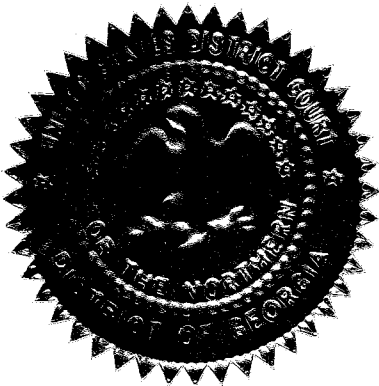
DO HEREBY CERTIFY that **BRADLEY K. GROFF, 312930**, was duly admitted to practice in said Court on November 4, 1994 and is in good standing as a member of the bar of said Court.

Dated at Atlanta, Georgia, this 10th day of December, 2007.

JAMES N. HATTEN
CLERK OF COURT

By:


Phyllis Brannon
Deputy Clerk



Court Name: U S DISTRICT COURT - AL/M
Division: 2
Receipt Number: 4602001766
Cashier ID: dyates
Transaction Date: 12/18/2007
Payer Name: CAPELL AND HOWARD

PRO HOC VICE
For: BRADLEY KENNETH GROFF
Case/Party: D-ALM-A-TT-YF-EEFUND-001
Amount: \$20.00

CHECK
Check/Money Order Num: 000855
Amt Tendered: \$20.00

Total Due: \$20.00
Total Tendered: \$20.00
Change Amt: \$0.00

3:07-CV-00048